

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF GUAM**

UNITED STATES OF AMERICA,)	CRIMINAL CASE NO. 07-00033-001
)	
Plaintiff,)	
)	DECLARATION IN SUPPORT OF PETITION
vs.)	
)	
JASON MICHAEL SALAS,)	
)	
Defendant.)	
)	

Re: Violation of Pretrial Release Conditions; Request for Summons.

I, Grace D. Flores, am the U.S. Probation Officer assigned to supervise Jason M. Salas, and in that capacity declare as follows:

On April 6, 2007, Jason M. Salas made an initial appearance before Magistrate Judge Joaquin V.E. Manibusan Jr. on an Indictment charging him with Counts I and II: Within Special Maritime and Territorial Jurisdiction, in violation of 18 U.S.C. §§661 and 7(3) & 2; Count III: Criminal Mischief, in violation of 9 GCA §34.50(d) and 18 U.S.C. §§2, 7(3), and 13; and Counts IV and V: Entering Military, Naval, or Coast Guard Property, in violation of 18 U.S.C. §1382. Mr. Salas was granted pretrial release with conditions. On July 9, 2007, he pled guilty to Count I of the Indictment and his sentencing hearing is scheduled for January 9, 2008 . Mr. Salas is alleged to have violated the following conditions of release:

Mandatory Condition: *The defendant shall not commit any offense in violation of federal, state or local law while on release in this case. (18 U.S.C. § 3142(c)(A)).*

On October 13, 2007, Jason Michael Salas was arrested for the offenses of Possession of a Firearms without a Firearms Identification Card and Theft by Receiving Stolen Property. Guam Police Department (GPD), Police Report Number KY07-28529, outlined the case as follows:

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On October 13, 2007, GPD Officers notified Alfred Cruz that his firearms were stolen as they were recovered in the course of another investigation. Mr. Cruz was unaware the firearms were stolen until GPD Officers informed him. After checking the storage location, Mr. Cruz noted that his four shotguns and one rifle were missing. He made a formal complaint with GPD regarding the theft. Mr. Cruz stated that only family members knew where he stored his firearms and the last time someone visited his home was on October 11, 2007. The family members that visited the home were his sister in law, Isabel Araneta, and her two minor sons J.J.A. and J.A.

In the course of their investigation GPD Officers noted Ignacio R. Quichocho and two minors, J.J.A. and A.J.C. to be involved with the theft and transfer of the firearms. Ignacio R. Quichocho was questioned and indicated that on October 11, 2007, the guns were stolen from the residence of Alfred Cruz. He stated that he parked his car away from the entrance of the Cruz residence and later, J.J.A. returned from his uncle's home with the five firearms in tow.

On October 13, 2007, through the cooperation of Quichocho, officers retrieved four shotguns from the front seat of a vehicle at the residence of Carl San Nicolas, a relative of Quichocho.

In a written statement, Quichocho informed officers that the fifth firearm, a Marlin Rifle 22 Caliber 883 serial number 11514295, was sold to Jason Salas for \$50.00. Quichocho noted during the evening of October 11, 2007, he agreed to meet Jason Salas at a residence in Mangilao to drink with him. They met and Quichocho asked Mr. Salas if he was interested in purchasing a gun. He showed the defendant the firearm in the trunk of the vehicle and Mr. Salas agreed to purchase it for \$50.00. Quichocho consulted with the minor, A.J.C., who agreed Mr. Salas could buy the rifle. No money was exchanged however, the rifle was given to Mr. Salas.

On October 13, 2007 GPD Officers conducted a check of the Mr. Salas' residence and no firearms were noted. Mr. Salas was questioned by GPD and denied purchasing or receiving a firearm. He indicated to officers that he knew Ignacio Quichocho through his brother in law, Roque Mantanona. He declined to provide a written statement.

Mr. Salas was booked and confined. He was subsequently released by the Attorney General's Office.

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Special Condition: Report as soon as possible, to the pretrial services office or supervising officer any contact with any law enforcement personnel, including, but not limited to, any arrest, questioning, or traffic stop. (18 U.S.C. §3142 (c)(B)(xiv))

Mr. Salas failed to report his arrest and contact with the Guam Police Department.

Recommendation: It is requested that a summons be issued, and that this matter be set for a hearing, and at that hearing, the defendant be held to answer or show cause why bail should not be revoked or why conditions of release should not be modified, or for any other matter for which the Court may deem just and proper.

I declare, under penalty of perjury, that the foregoing is true and correct, except those matters stated upon information and belief, and as to those matters, I believe them to be true.

Executed this 29th day of October 2007, at Hagatna, Guam, in conformance with the provisions of 28 U.S.C. § 1746.

Respectfully submitted,

ROSSANNA VILLAGOMEZ-AGUON
Acting Chief U.S. Probation Officer

By:



/s/ GRACE D. FLORES
U.S. Probation Officer

Reviewed by:



/s/ CARMEN D. O'MALLAN
U.S. Probation Officer Specialist
Supervision Unit Leader

cc: Ryan Anderson, SAUSA
John Gorman, FPD
File